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MEMO ENDORSED



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THE CITY OF NEW YORK  
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February 8, 2018

*BY ECF*

Honorable Andrew L. Carter, Jr.  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

Re: *Jerome Roman v. City of New York, et al.*,  
 17 Civ. 2697 (ALC)

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney representing defendants City of New York and Detective David Terrell (hereinafter "City defendants") in the above-referenced matter. City defendants write with the consent of plaintiff's counsel, Chukwuemeka Nwokoro, Esq., to respectfully request a 60 day extension of time from February 16, 2018 until April 17, 2018 within which the Local Civil Rule 83.10(8) ("the Plan") mediation session must occur. This is City defendant's third consent request for an extension of the Plan mediation deadline.

By way of background, plaintiff brings claims related to eight separate arrests. An extension of the mediation deadline is necessary so that City defendants may obtain, prior to the mediation session, outstanding files from the Bronx County District Attorney's Office ("Bronx DA's Office") pertaining to plaintiff's underlying arrests. In order to meaningfully evaluate plaintiff's claims and settlement demand, it is imperative that City defendants review the files pertaining to the prosecutions of plaintiff. Yesterday, the Bronx DA's Office produced four files pertaining to the arrests of plaintiff; however, the Bronx DA is still in the process of searching for the remaining four files, which pertain to older arrests and therefore possibly include archived files.

For the foregoing reasons, defendants City of New York and Detective David Terrell, respectfully request an extension of the deadline to complete Plan mediation from February 16,

2018 until April 17, 2018. Upon information and belief, this request will not affect any other deadlines in this case.

Thank you for your consideration.

Respectfully submitted,

/s/

Kiran H. Rosenkilde  
*Assistant Corporation Counsel*  
Special Federal Litigation Division

cc: Chukwuemeka Nwokoro, Esq. (By ECF)  
*Attorney for Plaintiff*

The application is ☒ granted.  
☐ denied.

  
Andrew L. Carter Jr, U.S.D.J.

Dated: 2-9-18

NY, New York